

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

-v-

23-MC-

One (1) Remington Arms Co. Model 14A,
35 REM caliber rifle, bearing serial no. C73727;

One (1) Savage Arms Inc. Mark II .22 caliber rifle,
bearing serial no. 3951680;

One (1) Anderson Manufacturing, Model AM-15
Multi, .300 Blackout caliber short barrel rifle,
bearing serial no. 21134370; and

3,523 rounds of assorted ammunition,

Defendants.

**STIPULATION TO EXTEND PLAINTIFF'S TIME
TO FILE COMPLAINT IN CIVIL FORFEITURE ACTION**

IT IS HEREBY STIPULATED and agreed upon between the parties, the United States of America by its attorney, Trini E. Ross, United States Attorney for the Western District of New York, Melanie J. Bailey, Assistant United States Attorney, of counsel, and, Dominic Saraceno, Esq., attorney for putative claimant Annalysse Mettler-Kitcho, that the government's time to file its Verified Complaint for Forfeiture be extended from August 22, 2023 to October 23, 2023, pursuant to Title 18, United States Code, Section 983(a)(3)(A).

The parties to this Stipulation further agree that Annalysse Mettler-Kitcho may revoke her consent in writing to extend the time for the government to file its Verified Complaint for Forfeiture against the above-named property, and in that event, the government shall then have ten (10) days from the date the government received notice of such action to file its Verified Complaint for Forfeiture.

TRINI E. ROSS
United States Attorney
Western District of New York

Dated: 8 / 21 /2023

BY:

Melanie J. Bailey
Melanie J. Bailey
Assistant United States Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, NY 14202
716-843-5700
Melanie.bailey@usdoj.gov

Dated: 8 / 19 /2023



Dominic Saraceno, Esq.
The Law Offices of Dominic Saraceno
534 Delaware Avenue
Buffalo, NY 14202
716-626-7007
Dominic@TheBuffaloCriminalAttorney.com
Attorney for Annalysse Mettler-Kitcho